

MARTIN A. MUCKLEROY, ESQ.
Nevada Bar No. 009634
MUCKLEROY LUNT, LLC
6077 S. Fort Apache, Ste 140
Las Vegas, NV 89148
Phone: (702) 907-0097
Direct: (702) 534-6272
Fax: (702) 938-4065
martin@muckleroylunt.com

Liaison Counsel for Plaintiffs

(Additional Counsel on Signature Page)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

IN RE ALLEGIANT TRAVEL CO.
STOCKHOLDER DERIVATIVE
LITIGATION

Master File No.: 2:18-cv-01864

**JOINT STATUS REPORT AND
~~PROPOSED~~ SCHEDULE**

WHEREAS, on March 24, 2020, Plaintiffs filed their second amended verified shareholder derivative complaint (the "Complaint") (ECF No. 20);

WHEREAS, on April 23, 2020, Defendants moved to dismiss the Complaint (ECF Nos. 21-23);

WHEREAS, on December 18, 2020, the Court granted the motion to dismiss without prejudice and directed Plaintiffs to file an amended complaint by January 18, 2021;

WHEREAS, the Parties have met and conferred concerning Plaintiffs' intent to amend the Complaint; and

WHEREAS, due to existing scheduling conflicts Plaintiffs request additional time to file their amended complaint and Defendants do not oppose such extension;

1 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by the parties,
2 through their undersigned counsel and subject to the approval of the Court:

- 3 1. Plaintiffs shall file and serve any amended complaint by February 18, 2021;
4 2. Defendants shall have forty-five days from service of the Amended Verified
5 Consolidated Stockholder Derivative Complaint to respond;
6 3. In the event Defendants move to dismiss the amended complaint, Plaintiffs shall
7 have forty-five days to file and serve their opposition papers; and Defendants shall have
8 forty-five days to file and serve any reply memorandum.

9 **IT IS SO STIPULATED**

10
11
12 DATED: December 30, 2020

Respectfully submitted,

13 /s/ Martin A. Muckleroy
14 MARTIN A. MUCKLEROY, ESQ.
15 Nevada Bar No. 009634
16 **MUCKLEROY LUNT, LLC**
17 6077 S. Fort Apache, Ste. 140
18 Las Vegas, NV 89148
19 Telephone: (702) 907-0097
20 Facsimile: (702) 938-4065
21 Email: martin@muckleroylunt.com

Liaison Counsel for Plaintiffs

22 DAVID J. STONE, ESQ.
23 **BRAGAR EAGEL & SQUIRE, P.C.**
24 885 Third Avenue, Suite 3040
25 New York, NY 10022
26 Telephone: 212-308-5858
27 Facsimile: 212-486-0462
28 Email: stone@bespc.com

1 MELISSA FORTUNATO, ESQ.
2 **BRAGAR EAGEL & SQUIRE, P.C.**
3 101 California Street, Suite 2710
4 San Francisco, CA 94111
5 Telephone: (415) 365-7140
6 Email: mfortunato@bespc.com

7 MATTHEW M. HOUSTON, ESQ.
8 BENJAMIN I. SACHS-MICHAELS, ESQ.
9 **GLANCY PRONGAY & MURRAY LLP**
10 712 Fifth Avenue
11 New York, New York 10019
12 Telephone: (212) 935-7400
13 E-mail: mhouston@glancylaw.com
14 bsachsmichaels@glancylaw.com

15 ROBERT V. PRONGAY, ESQ.
16 **GLANCY PRONGAY & MURRAY LLP**
17 1925 Century Park East, Suite 2100
18 Los Angeles, California 90067
19 Telephone: (310) 201-9150
20 Facsimile: (310) 210-9160
21 E-mail: rprongay@glancylaw.com
22 lportnoy@glancylaw.com

23 *Co-Lead Counsel for Plaintiffs*

24 **GREENBERG TRAURIG LLP**

25 By /s/ Jacob D. Bundick

26 MARK F. FERRARIO, ESQ.
27 Nevada Bar No. 1625
28 JACOB D. BUNDICK, ESQ.
Nevada Bar No. 9772
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135

DANIEL J. TYUKODY, ESQ.
Admitted Pro Hac Vice
GREENBERG TRAURIG LLP
1840 Century Park East, Suite 1900
Los Angeles, CA 90067

Counsel for Defendants

IT IS SO ORDERED this 4th day of January, 2021.



Andrew P. Gordon
United States District Judge

ATTESTATION OF COUNSEL

I, Martin A. Muckleroy, am the CM/ECF user whose ID and password are being used to file this Joint Status Report and [Proposed] Order. Pursuant to Local Civil Rule 5-1(i)(3), I hereby attest that Jacob D. Bundick, on whose behalf this filing is jointly submitted, has concurred in this filing.

By
/s/ Martin A. Muckleroy
Martin A. Muckleroy